

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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INDUSTRIAL CARRIERS INC., :
 :
 Plaintiff, :
 :
 - against - : 08 CV 03446 (HB)
 : ECF CASE
 :
 DYNACOAL LTD., GLOBAL COAL :
 TRADE CO. LTD. a.k.a. GLOBAL COAL :
 TRADE, CHINA COAL TRADE CO. LTD., :
 DYNASHIPPING LTD., :
 SUPER ENERJI MADENCILIK INS. :
 SANAYI VE TICARET A.S. a.k.a. SUPER :
 ENERJI, SUPER KARBON MADENCILIK :
 INS. SANAYI VE TICARET A.S. a.k.a. :
 SUPER KARBON, and ENERJI MADEN :
 URUNLERI SANAYI VE TICARET A.S. :
 a.k.a. ENERJI MADEN, :
 :
 Defendants. :
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AMENDED AFFIDAVIT IN SUPPORT OF PRAYER FOR MARITIME ATTACHMENT

State of Connecticut)
) ss: SOUTHPORT
County of Fairfield)

Lauren C. Davies, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and represent the Plaintiff herein. I am familiar with the facts of this case and make this Affidavit in support of Plaintiff's prayer for the issuance of a Writ of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Admiralty Rules of the Federal Rules of Civil Procedure.

DEFENDANTS ARE NOT PRESENT IN THE DISTRICT

2. I have attempted to locate the Defendants, DYNACOAL LTD., GLOBAL COAL TRADE CO. LTD. a.k.a. GLOBAL COAL TRADE, CHINA COAL TRADE CO. LTD., DYNASHIPPING LTD., SUPER ENERJI MADENCILIK INS. SANAYI VE TICARET A.S.

a.k.a. SUPER ENERJI, SUPER KARBON MADENCILIK INS. SANAYI VE TICARET A.S.
a.k.a. SUPER KARBON and ENERJI MADEN URUNLERI SANAYI VE TICARET A.S. a.k.a.
ENERJI MADEN, within this District. As part of my investigation to locate the Defendants
within this District, I checked the telephone company information directory all area codes within
the District, as well as the white and yellow pages for New York listed on the Internet or World
Wide Web, and did not find a listing for the Defendants. Finally, I checked the New York State
Department of Corporations' online database that showed no listing or registration for the
Defendants. I was also unable to find any information to indicate that the Defendants has a
general or managing agent within the District.

3. I submit that Defendants cannot be found within this District within the meaning
of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims.

4. Upon information and belief, the Defendants have, or will have during the
pendency of this action, tangible and intangible property within the District.

PRAYER FOR RELIEF TO SERVE LATER IDENTIFIED GARNISHEES

5. Plaintiff also respectfully requests that the Court grant it leave to serve any
additional garnishee(s) who may, upon information and belief obtained in the course of this
litigation to be holding, or believed to be holding, property of the Defendants, within this
District. Obtaining leave of Court at this time to serve any later identified garnishees will allow
for prompt service of the Process of Maritime Attachment and Garnishment without the need to
present to the court amended Process seeking simply to identify other garnishee(s).

PRAYER FOR RELIEF TO DEEM SERVICE CONTINUOUS

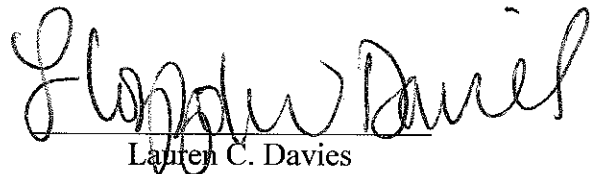
6. Further, in order to avoid the need to repetitively serve the garnishees/banks,
Plaintiff respectfully seeks further leave of the Court, as set out in the accompanying Amended

Ex Parte Order for Process of Maritime Attachment, for any process that is served on a garnishee to be deemed effective and continuous service of process throughout any given day on which process is served through the next day, provided that process is served the next day, to authorize service of process via facsimile or e-mail following initial *in personam* service.

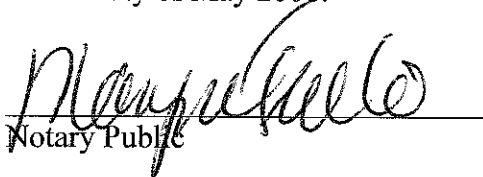
7. This is Plaintiff's first request for the specific relief sought herein made to any Court.

Dated: May 6, 2008

Southport, CT


Lauren C. Davies

Sworn and subscribed to before me
this 6th day of May 2008.


Notary Public